

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-10027-PBS
	)	VIOLATIONS:
MATTHEW VICKERS	)	21 U.S.C. § 841(a)(1) -
	)	Possession of a Controlled
	)	Substance With Intent to
	)	Distribute
	)	18 U.S.C. § 922(g)(1) -
	)	Felon in Possession of a
	)	Firearm and Ammunition
	)	18 U.S.C. § 922(k) -
	)	Possession of a Firearm With
	)	an Obliterated Serial Number

SUPERSEDING INFORMATION

COUNT ONE: (21 U.S.C. § 841(a)(1) - Possession with Intent  
to Distribute Cocaine)

The United States Attorney charges that:

On or about May 14, 2001, at Boston, in the District of  
Massachusetts,

**MATTHEW VICKERS,**

the defendant herein, did knowingly and intentionally possess  
with intent to distribute cocaine, a Schedule II controlled  
substance.

All in violation of Title 21, United States Code, Section  
841(a)(1).

**COUNT TWO:**        (21 U.S.C. § 841(a)(1) - Possession with Intent  
                         to Distribute Cocaine Base)

The United States Attorney further charges that:

On or about October 19, 2003, at Boston, in the District of  
Massachusetts,

**MATTHEW VICKERS,**

the defendant herein, did knowingly and intentionally possess  
with intent to distribute more than five grams of cocaine base, a  
Schedule II controlled substance.

All in violation of Title 21, United States Code, Section  
841(a)(1).

**COUNT THREE: (18 U.S.C. § 922(g)(1) -- Felon in Possession of  
a Firearm and Ammunition)**

The United States Attorney further charges that:

On or about December 29, 2001, at Boston, in the District of  
Massachusetts,

**MATTHEW VICKERS,**

defendant herein, having previously been convicted of a crime  
punishable by a term of imprisonment exceeding one year, did  
knowingly possess in and affecting commerce a firearm, to wit: a  
Bryco Jennings brand, 9mm semi-automatic pistol, with an  
obliterated serial number, and various rounds of 9mm ammunition.

All in violation of Title 18, United States Code, Section  
922(g)(1).

**COUNT FOUR: (18 U.S.C. § 922(k) -- Possession of a  
Firearm with Obliterates Serial Number)**

The United States Attorney further charges that:

On or about December 29, 2001, at Boston, in the District of  
Massachusetts,

**MATTHEW VICKERS,**

defendant herein, did knowingly possess in and affecting commerce  
a firearm which had had the importer's and manufacturer's serial  
number obliterated, to wit: a Bryco Jennings brand, 9mm semi-  
automatic pistol.

All in violation of Title 18, United States Code, Section  
922(k).

**Supplemental Factual Allegations**

The United States Attorney further alleges that:

1. The offense charged in Count One involved at least 50 grams but less than 100 grams of cocaine. Accordingly, U.S.S.G. §2D1.1(c)(12) applies to this case.


2. The offense charged in Count Two involved at least 5 grams but less than 20 grams of cocaine base. Accordingly, U.S.S.G. §2D1.1(c)(7) applies to this case.

3. The firearm involved in the offenses charged in Count Three and Count Four had an obliterated serial number. Accordingly, U.S.S.G. §2K2.1(b)(4) applies to this case.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
/s/ Robert E. Richardson  
ROBERT E. RICHARDSON  
Assistant U.S. Attorney

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: \_\_\_\_\_ Category No. II Investigating Agency ATFCity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. X Case No. 04-10027-PBS  
Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Matthew Vickers Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date: \*\*/\*\*/78 SS#: \*\*\*-\*\*-9764 Sex: M Race: B Nationality: U.S.Defense Counsel if known: Timothy Watkins Address: Federal Defender's Office

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Robert E. Richardson Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☐ Regular Process ☒ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☒ Already in Federal Custody as pretrial detainee in custody of U.S. Marshal☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☒ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☒ Information ☐ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 4

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☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 1/5/03 Signature of AUSA: Robert E. Richardson

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Matthew Vickers

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21 U.S.C. § 841(a)(1)</u>	<u>Possession Cocaine With Intent to Distribute</u>	<u>1</u>
Set 2	<u>21 U.S.C. § 841(a)(1)</u>	<u>Possession Cocaine Base With Intent to Distribute</u>	<u>2</u>
Set 3	<u>18 U.S.C. § 922(g)(1)</u>	<u>Felon in Possession of Firearm and Ammunition</u>	<u>3</u>
Set 4	<u>18 U.S.C. § 922(k)</u>	<u>Possession of Firearm With Obliterated Serial No.</u>	<u>4</u>
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: \_\_\_\_\_